

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

DORMAN ANGEL, et al.	:	CIVIL ACTION NO. C-1-01-467
	:	
Plaintiffs	:	JUDGE: SANDRA S. BECKWITH
	:	
vs.	:	
	:	<u>PLAINTIFFS' MOTION FOR AN</u>
UNITED PAPERWORKERS	:	<u>EXTENSION OF TIME TO CONDUCT</u>
INTERNATIONAL UNION (PACE)	:	<u>DISCOVERY</u>
LOCAL 1967, et al.	:	
	:	
Defendants	:	

Now come Plaintiffs, by and through counsel, and hereby request an additional thirty (30) days until January 31, 2005 in which to conduct discovery. A memorandum in support of the motion follows herein.

RESPECTFULLY SUBMITTED,

/s/ Mark J. Byrne

MARK J. BYRNE - #0029243

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MEMORANDUM

Plaintiffs and Defendants have been engaged in various discovery relating to the above-captioned matter. Approximately 35 depositions of the Plaintiffs have been taken and numerous depositions of the Defendants. However, the parties have not been able to conclude discovery as

there are depositions still to be taken by some of the Defendants' employees. Therefore, Plaintiffs respectfully request until January 31, 2005 in which to conclude the discovery. This motion is not opposed by any of the Defendants.

RESPECTFULLY SUBMITTED,

/s/ Mark J. Byrne

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CERTIFICATE OF SERVICE

I hereby certify that on December 28, 2004, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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I also certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

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